

# **Exhibit B**

**REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

Glaser Weil

KERRY GARVIS WRIGHT - State Bar No. 206320  
 kgarviswright@glaserweil.com  
 THOMAS P. BURKE JR. - State Bar No. 288261  
 tburke@glaserweil.com  
 GLASER WEIL FINK HOWARD  
 AVCHEN & SHAPIRO LLP  
 10250 Constellation Boulevard, 19th Floor  
 Los Angeles, California 90067  
 Telephone: (310) 553-3000  
 Facsimile: (310) 556-2920

Attorneys for Petitioner  
 Marcy Simon

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

MARCY SIMON, an individual residing in New York,

Petitioner,

v.

MAPLE BEACH VENTURES, LLC, a Nevada limited liability company; MAPLE BEACH VENTURES ONE, LLC, a Wyoming limited liability company; and MAPLE BEACH VENTURES ONE, LLC, a Delaware limited liability company,

Respondents.

CASE NO.: 3:21-mc-80013

**DECLARATION OF KERRY GARVIS WRIGHT IN SUPPORT OF PETITIONER MARCY SIMON'S NOTICE OF PETITION AND PETITION TO CONFIRM ARBITRATION AWARD AND FOR ENTRY OF JUDGMENT**

[9 U.S.C. § 9 (Federal Arbitration Act)]

DATE: TBD  
 TIME: TBD  
 COURTROOM: TBD

**DECLARATION OF KERRY GARVIS WRIGHT**

I, KERRY GARVIS WRIGHT, declare as follows:

1. I am an attorney at law duly licensed to practice before the Northern District of California and all courts of the State of California and am a partner in the law firm of Glaser Weil Fink Howard Avchen & Shapiro LLP, attorneys of record for Petitioner Marcy Simon. I make this declaration in support of Ms. Simon's Petition to Confirm Arbitration Award and for Entry of Judgment. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Corrected Final Award dated January 13, 2021, issued in *Marcy Simon v. Maple Beach Ventures, LLC, et al.*, JAMS Reference No. 1100105449.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Consulting Agreement dated September 19, 2014, by and between Marcy Simon and Maple Beach Ventures, LLC.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Settlement Agreement and Mutual Release dated September 19, 2014, by and between Marcy Simon and [REDACTED].

5. Attached hereto as **Exhibit 4** is a true and correct copy of the Non-Disclosure Agreement dated September 19, 2014, by and between Marcy Simon and [REDACTED].

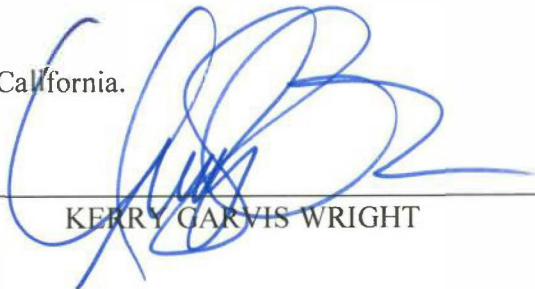
6. Attached hereto as **Exhibit 5** is a true and correct copy of Amendment No. 1 dated October 10, 2016, by and between Marcy Simon, [REDACTED], and Maple Beach Ventures, LLC.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the Limited Liability Company Agreement of Maple Beach Ventures One, LLC, a Delaware limited liability company.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the Global Assignment Agreement dated January 1, 2018, by and between Derek Rundell; Maple Beach Ventures, LLC; Maple Beach Ventures One, LLC; and [REDACTED].

1 I declare under penalty of perjury pursuant to the laws of the United States of America  
2 that the foregoing facts are true and correct.

3 Executed on January 19, 2021 at Los Angeles, California.

4   
5 KERRY GARVIS WRIGHT  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28